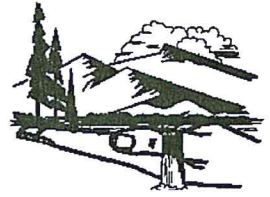




Matthew H. Mead, Governor

Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's
environment for the benefit of current and future generations.*



Todd Parfitt, Director

December 1, 2015

RE: 2015 Sulfur Dioxide Emissions Inventory

This letter is being directed to you because your facility was identified in 2015 as a source subject to the Emissions Trading Program under Chapter 14, Section 3 of the Wyoming Air Quality Standards and Regulations (Ch. 14, Sec. 3 of the WAQSR). The Air Quality Division (AQD) enacted this regulation as a cornerstone piece of the Wyoming Regional Haze State Implementation Plan, authorized under Wyoming Statute number 35-11-214, and filed with the Secretary of State's Office on January 28, 2004.

As required by Chapter 14, Section 3(b) (iii) of the WAQSR, each source subject to these regulations shall report SO₂ emissions for the 2015 calendar year by April 15, 2016. The inventory submitted must meet the specifications listed under Section 3(b) and must be adjusted as explained under Section 3(c) if the emission measurement technique has changed since the baseline year of 2006.

As facilities have been informed in the past, Ch. 14, Sec. 3 of the WAQSR establishes record keeping and reporting requirements for stationary sources of sulfur dioxide (SO₂) to determine if SO₂ emissions in the region remain below the milestones established in the State Implementation Plan for Regional Haze. The applicability portion of the rule states that in any calendar year from 2000 onward, if SO₂ emissions equal or exceed 100 tons from any source or facility, then that source or facility is subject to these emission inventory requirements. These requirements shall remain in effect until such time the facility permanently shuts down.

There has been confusion in the past regarding the adjustment provision of Section 3(c). The intent of this section is to assure the current year emissions total is representative of the Base Year upon which the Milestones were built. **Under the revised plans, the base year is 2006.** Therefore, emissions must be adjusted back to the baseline year of 2006 to account for changes that occur due to a change in the emission calculation methodology. It should be noted that both emission totals, emissions using the 2006 baseline year methodology and the methodology used to calculate calendar year 2015 emissions, must be provided if applicable. If the calculation methodology has changed from the base year, please check the box on the attached form which indicates the calculation methodology has changed.



There has been additional confusion on what other information may be required to be submitted to the AQD for changes in emissions. If the total facility SO₂ emissions for calendar year 2015 changed by more than $\pm 20\%$ from calendar year 2014, a detailed explanation of what caused the emissions to increase or decrease by 20% **must** be provided. Finally, for sources covered by 40 CFR Part 75 flow adjustments, since the new Base Year for emissions is 2006, **the flow adjustments under 40 CFR Part 75 are no longer required to be made.**

IMPACT is the preferred method of submission for the 2015 SO₂ Inventories. If the SO₂ Inventories are submitted electronically through IMPACT, there is no need to submit any paper documents to the Emissions Inventory Group in Cheyenne or the District Engineer.

If industry representatives cannot submit electronically through IMPACT and choose to submit paper SO₂ Inventories, only one original, signed report will need to be submitted. If not submitting through IMPACT, please use the appropriate form when submitting the SO₂ inventory. This form is available on the Wyoming Department of Environmental Quality website at the following link <http://deq.wyoming.gov/aqd/emission-inventories/resources/annual-sulfur-dioxide-inventory/>

If not submitting through IMPACT, please submit this inventory to:

Darla Potter
AQRM Program Manager
WDEQ - Air Quality Division
200 West 17th Street
Cheyenne, Wyoming 82002

As previously stated, the Chapter 14 SO₂ inventories must be received by the AQD on or before April 15, 2016. Should you have any additional questions or comments regarding the interpretation of Chapter 14 or SO₂ emission inventory requirements, please feel free to contact myself at (307) 777-7380, for further assistance. Additionally, please provide any updates to the facility contact information.

Sincerely,



Darla J. Potter
Air Quality Resource Management Program Manager
Air Quality Division

cc: District Engineers (Districts I thru V)
Amber Potts